IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Derivatively on Behalf of Nominal Defendant NAVIENT CORPORATION,)) Civ. A. No. 2:19-cv-00062-LAS
Plaintiff,)
v.)
WILLIAM M. DIEFENDERFER, III, JOHN K. ADAMS, ANNA ESCOBEDO CABRAL, DIANE SUITT GILLELAND, KATHERINE A. LEHMAN, LINDA A. MILLS, JOHN (JACK) F. REMONDI, JANE J. THOMPSON, LAURA S. UNGER, BARRY L. WILLIAMS, ANN TORRE BATES, STEVEN L. SHAPIRO, BARRY A. MUNITZ, TIMOTHY J. HYNES, IV, SOMSAK CHIVAVIBAL, JOHN M.	
KANE, and CHRISTIAN M. LOWN, Defendants,))
- and -))
NAVIENT CORPORATION,)
Nominal Defendant.)
)

PROOF OF COMPLIANCE WITH NOTICE REQUIREMENTS

In its Order of January 23, 2019, this Court directed counsel for Navient Corporation ("Navient") to file with the Court by April 1, 2019, proof of compliance with the notice procedures set forth in that Order. Attached in satisfaction thereof are a Declaration of Christopher S. Turner and exhibits thereto, demonstrating compliance with Navient's notice obligations in the January 23, 2019 Order preliminarily approving settlement of this Action.

DATED: April 1, 2019 Respectfully submitted,

/s/ Gregory B. in den Berken

Andrew B. Clubok (admitted *pro hac vice*) Christopher S. Turner (admitted *pro hac vice*) Gregory B. in den Berken (PA Bar No. 321964) LATHAM & WATKINS LLP 555 Eleventh Street, NW

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on this 1st day of April, 2019.

<u>/s/ Gregory B. in den Berken</u> GREGORY B. IN DEN BERKEN